

## **FINDING AND RECOMMENDATION(S)**

**Submitted by: Lake Tahoe Area Air Quality Working Group**

### **Finding:**

Atmospheric conditions and air quality determine the amount of burning that can take place on a given day without adverse impacts to air quality. If not carefully managed, smoke can result in human health impacts that may range from a minor nuisance to serious health effects.

### **Background and Supporting Evidence:**

1. On the California portion of the Lake Tahoe Air Basin, the California Air Resources Board (CARB) oversees a collaborative smoke management program in which state and local air quality agencies work together with land managers to match prescribed burning and other open burning activities with appropriate atmospheric conditions in order to minimize smoke impacts and protect public health. CARB meteorologists utilize specific criteria such as mixing heights and wind speeds in conjunction with air quality data to determine the daily agricultural burn day status for the basin. In the State of Nevada, meteorological forecasting is not conducted by the Air Quality Agencies since burning is not prohibited on any day.

The current criteria for the Lake Tahoe Air Basin, outlined in Title 17 of the California Code of Regulations (CCR), were adopted by the Air Resources Board in 1977. Over the last 10 years, the annual percentage of permissive burn days has ranged from 41% to 71%. In recent years, CARB has incorporated additional meteorological information into the forecasting process, which allowed the implementation of marginal burn days during which the burning of smaller amounts of material is allowed when the likelihood of creating a smoke nuisance is minimal. Since 2002, the average number of permissive burn days has increased by more than 10%, and more than 15% over the most recent three-year period.

The CARB can develop test programs to evaluate different scenarios (such as using the Mountain Counties Air Basin criteria or developing an acreage allocation system) to determine possible changes to the program that may result in increased burning opportunities while protecting public health.

2. Currently, if the meteorological conditions warrant changes, CARB can revise the burn day decision from no burn to a burn day on a case by case basis,. Further, a change of burn day status can be prompted by a request from an air district or a land manager, or by CARB's own analysis of the meteorological

conditions. "Success" in prescribed burning always includes smoke management, in addition to safety, effectiveness and other criteria.

3. Placer County has a policy of designating all federal holidays as no burn days, regardless of the CARB burn day designation. This provides the public with a smoke free environment when many are enjoying outdoor and family time.
4. Marginal burn days have not always been as available for prescribed burning in El Dorado County as it has been in Placer County.

### **Recommendation(s):**

The following recommendations address information in the respective numbered items in Background and Supporting Evidence:

1. The California Air Resources Board will develop and implement a test program, by March 1, 2008, to evaluate alternate burn day criteria, to see if additional burn days can be added in the Lake Tahoe Air Basin without adverse effects on the region's air quality. A subgroup of the Lake Tahoe Area Air Quality Working Group will work with CARB to assist in identifying and/or developing the test criteria.
2. The California Air Resources Board and local Air Pollution Control Districts should consider permitting more prescribed burning ahead of good dispersal conditions by declaring and permitting more "marginal burn days with improving conditions" the day before the arrival of a weather system.
3. Placer County APCD and land managers can work together to allow a prescribed burn on a federal holiday, if it is a CARB permissive burn day.
4. El Dorado County AQMD will allow burning on marginal burn days similarly to Placer County APCD (This is already occurring.).
5. The California Air Resources Board will consider conducting a feasibility study as part of their test program to allow implementing agencies in the Lake Tahoe Basin to consider the daily burn day status as information only, and to use their own discretion to decide when to burn, which has proven successful on the Nevada side.

### **Impacts of Implementation:**

Analysis of impacts on the following factors is REQUIRED (Best Estimate):

- ☐ Cost: No direct capital costs will be incurred. Indirect costs will result from the staff time spent developing the test criteria and coordinating with other agencies.

- ☐ Funding source: Involved agencies operating budgets.
  
- ☐ Staffing: There are no specific requirements for new staff. However, development of the test criteria and coordination between the agencies may require a substantial time commitment from current staff in all the involved agencies.
  
- ☐ Existing regulations and/or laws: Title 17, California Code of Regulations Subchapter 2. Smoke Management Guidelines for Agricultural and Prescribed Burning.

Analysis of impacts on the following factors is OPTIONAL:

- ☐ Operational
- ☐ Social
- ☐ Political
- ☐ Policy
- ☐ Health and Safety
- ☐ Environmental
- ☐ Interagency: Development of the test criteria will require participation from multiple agencies involved in land management and environmental protection